

	I and the second		
1	Law Offices of David S. Secrest A Professional Corporation		
2	David S. Secrest (SBN 142299) 504 Plaza Alhambra, Suite 205		
3	P.O. Box 1029 El Granada, CA 94018-1029		
5	Tel: 650-726-7461 Fax: 650-726-7471 Attorney for Plaintiff Timothy Sanocki		
6	SEYFARTH SHAW LLP		
7	Dana L. Peterson (SBN: 178499) 560 Mission Street, Suite 3100		
8	San Francisco, California 94105 Telephone: (415) 397-2823 Facsimile: (415) 397-8549		
9			
10	Attorneys for Defendant SERCO GROUP PLC, SERCO, INC. DE, PAUL CARPMAEL, RAQUEL SANCHEZ, KEITH HULBERT, MIKE HENRY		
11			
12			
13			
14	UNITED STATES DISTRICT COURT		
15	NORTHERN DISTRICT OF CALIFORNIA		
16	TIMOTHY SANOCKI,) Case No. CV 08-2740 MHP	
17	Plaintiff,	STIPULATION FOR CONTINUANCEOF HEARING ON PLAINTIFF	
18	V.	TIMOTHY SANOCKI'S MOTION FOR REMAND, AND FOR COSTS;	
19 20	SERCO GROUP PLC, SERCO, INC. DE, PAUL CARPMAEL, RAQUEL SANCHEZ, KEITH HULBERT, MIKE HENRY, and DOES 1-50, inclusive	() [PROPOSÉD] ORDER () ()	
21	Defendants.)	
22			
23			
24	The parties herein, Plaintiff Timothy Sanocki ("Plaintiff") and Defendants SERCO		
25	Group, PLC, SERCO, Inc. (erroneously sued as SERCO, INC. DE), Paul Carpmael, Raquel		
26	Sanchez, Keith Hulbert, and Mike Henry (collectively "Defendants") have reached a settlement		
27	of this action and are currently awaiting the appropriate signatures on the Settlement Agreement.		
28	It is anticipated that this will be completed next week		
	STIPULATION FOR DISMISSAL WITH PREJUDICE AND [PROPOSED] ORDER/Case No. CV 08-2740 MHP		

Case 3:08-cv-02740-MHP Document 23 Filed 11/19/08 Page 2 of 2

1	IT IS HEREBY STIPULATED, by and between Plaintiff and Defendants, by and through	
2	their respective attorneys of record, that the hearing on the Plaintiff's Motion to Remand,	
3	currently set for hearing on Monday, November 17, 2008, at 2:00 p.m., shall be continued to a	
4	date uncertain to be determined by the Court. As soon as all signatures to the Settlement	
5	Agreement have been obtained, the parties will file their Stipulation to Dismiss this action in its	
6	entirety.	
7	IT IS SO STIPULATED	
8	DATED: November 14, 2008	SEYFARTH SHAW LLP
9		
10		ByBy
11		Attorneys for Defendants
12		SERCO GROUP PLC, SERCO, INC. DE, PAUL CARPMAEL, RAQUEL SANCHEZ,
13	DATED N. 1 14 2000	KEITH HULBERT, and MIKE HENRY
14	DATED: November14, 2008	LAW OFFICES OF DAVID S. SECREST
15		D-: /C/
16		By /S/ David S. Secrest
17		Attorney for Plaintiff TIMOTHY SANOCKI
18		
19		
20		<u>ORDER</u>
21	Pursuant to the stipulation of the parties, the above entitled action is continued to the	
22	following date and time: December 15, 2008 at 2:00 PM. December 15, 2008 at 2:00 PM. December 15, 2008 at 2:00 PM.	
23	IT IS SO ORDERED.	SEL
24	DATED:11/18	2008
25		H. Patel, purt Judge
26		Judge Marilyn H. Patel
27		Judge Marnyn 12
28		-2- (F)
	STIPULATION FOR DISMISSAL WIT SF1 28339445.1 / 19646-000096	